

IN THE COURT OF COMMON PLEAS
ASHTABULA COUNTY, OHIO
CIVIL DIVISION

PHILLIP DUBSKY
4534 Lake Road East
Geneva, OH 44041

AND

CHARLES HARPER
2250 Warrensville Center Road
University Hts., OH 44118

AND

NORBERTO JUAN
6508 Detroit Ave.
Cleveland, OH 44102

AND

JANG KONGTHONG
6961 Carol Drive
Independence, OH 44134

AND

DAN ROSE
481 E. 185th Street
Euclid, OH 44119

AND

DAVID ROSE
6428 Brooks Blvd.
Mentor, OH 44060

AND

MARVIN SPEER
120 Victoria Place
Painesville, OH 44077

AND

CASE NO.: 05CV 00395

JUDGE: ALFRED MACKEY

FIRST AMENDED
COMPLAINT FOR
MONEY DAMAGES
AND INJUNCTIVE RELIEF
WITH CLASS ACTION STATUS

JURY DEMAND
ENDORSED HEREON

FILED
2005 OCT 18 A 10:47
CAROL A. MEAD
CLERK OF COURTS
COMMON PLEAS COURT
ASHTABULA CO. OH



MF2155

Aug. 20. 2009 10:54AM

SONIA TANIO
5151 Warrensville Center Road
Maple Hts., OH 44137

Plaintiffs

-vs-

FLAGSTAFF INDUSTRIES CORP.
560 State Road
P.O. Box 1330
Bensalem, PA 19020

Defendant

Now come Plaintiffs, Phillip Dubsky, Charles Harper, Norberto Juan, Jang Kongthong, Dan Rose, David Rose, Marvin Speer, and Sonia Tanio, by and through Counsel, who allege and say:

PRELIMINARY STATEMENT

1. This matter is a civil action for damages and injunctive relief against the defendant, under the federal **Telephone Consumer Protection Act (TCPA)**, Title 47, United States Code, Section 227. This court has jurisdiction and authority to hear and decide the Plaintiffs' claim, pursuant to Section 227(b)(3), United States Code, Title 47, which grants **exclusive** jurisdiction to State courts.

2. This matter is also a claim for damages and injunctive relief against the defendant, under the Ohio Consumer Sales Practices Act (CSPA), Section 1345.02(A), Ohio Revised Code. This court has jurisdiction and authority to hear and decide the Plaintiffs' claim, pursuant to Section 1345.04 of the Ohio Revised Code.

FACTS

3. Defendant engaged in acts or practices which violated the federal TCPA and the Ohio CSPA, to the detriment of Plaintiffs, as herein described in this Complaint.

4. The federal TCPA and Ohio CSPA are both remedial statutes. Section 1.11 of the Ohio Revised Code requires that "Remedial laws and all proceedings under them shall be liberally construed in order to promote their object and assist the parties in obtaining justice."

5. The federal Telephone Consumer Protection Act (TCPA) provides that it is **unlawful for any person within the United States to use any telephone facsimile machine to send an unsolicited advertisement to a telephone facsimile machine.** See, Section 227(b)(1)(C), United States Code, Title 47.

6. An "unsolicited advertisement" is defined by Section 227(a)(4), United States Code, Title 47, to mean "any material advertising the commercial availability or quality of any property, goods, or services which is transmitted to any person without that person's prior express invitation or permission."

7. The Plaintiffs Phillip Dubsky, Charles Harper, Norberto Juan, Jang Kongthong, Dan Rose, David Rose, Marvin Speer, and Sonia Tanio received a total of nineteen (19) unsolicited facsimile ("fax") advertisements transmitted by or on behalf of the defendant **Flagstaff Industries Corp.**, advertising the commercial availability or quality of its goods or services, as follows:

8. Sometime in the year 2003, the Plaintiff **Phillip Dubsky** received one (1) unsolicited fax advertisement on his facsimile machine.

9. On or about July 22, 2002 and sometime in the year 2001, the Plaintiff

Charles Harper received two (2) unsolicited fax advertisements on his facsimile machine.

10. On or about September 9, 2002, the Plaintiff **Norberto Juan** received one (1) unsolicited fax advertisement on his facsimile machine.

11. Sometime in the year 2002, the Plaintiff **Jang Kongthong** received one (1) unsolicited fax advertisement on his facsimile machine.

12. Sometime in the year 2003, the Plaintiff **Dan Rose** received one (1) unsolicited fax advertisement on his facsimile machine.

13. On or about July 22, 2002, the Plaintiff **David Rose** received one (1) unsolicited fax advertisement on his facsimile machine.

14. On or about July 22, 2002, the Plaintiff **Marvin Speer** received one (1) unsolicited fax advertisement on his facsimile machine.

15. On or about September 9, 2002 and sometime in the year 2003, the Plaintiff **Sonia Tanio** received twelve (12) unsolicited fax advertisements on her facsimile machine.

16. The aforementioned unsolicited fax advertisements were transmitted by or on behalf of defendant **Flagstaff Industries Corp.**, advertising the commercial availability and quality of goods or services.

17. Defendant *did not* obtain "prior express invitation or permission" before sending its fax advertisements.

18. The defendant transacts business in Ohio through solicitation and/or sales of goods or services.

19. The defendant has committed tortious injury in Ohio, through acts and

practices in violation of the federal Telephone Consumer Protection Act and the Ohio Consumer Sales Practices Act, as described in this Complaint.

FIRST CLAIM

20. Plaintiffs re-allege paragraphs One (1) through Nineteen (19) of this Complaint, as if fully rewritten herein.

21. Defendant's aforementioned unsolicited fax advertisements were transmitted in violation of the federal Telephone Consumer Protection Act (TCPA), Section 227(a)(4) and 227(b)(1)(C), United States Code, Title 47.

22. Defendant's transmission of unsolicited fax advertisements constitutes an *unlawful taking* of Plaintiffs' fax paper, toner ink and electricity, as well as an *unauthorized use* of Plaintiffs', fax machines. These are implicit acts of conversion, property damage and violation of the privacy rights of the Plaintiffs, for which the TCPA provides a statutory remedy. See, 47 U.S.C. §§ 227(b)(1)(C) and 227(b)(3).

23. The Plaintiffs are entitled, under Section 227(b)(3), United States Code, Title 47, to bring an action in this court to enjoin further violations, and to receive damages in the sum of **Five Hundred Dollars (\$500)** for each separate violation, or **Triple Damages (\$1,500)**, if the fax advertisements were transmitted willfully.

24. A defendant acts "willfully" if it acts voluntarily, and under its own free will, regardless of whether the defendant knew that it was acting in violation of the statute.

25. The defendant, **Flagstaff Industries Corp.**, acted voluntarily, and under its own free will, and thus *willfully* sent, or caused to be sent, unsolicited advertisements by fax.

26. The defendant *knew* that it was sending, or causing to be sent, unsolicited advertisements by fax.

27. Defendant is therefore liable for the sum of **\$54,400** in damages, for its unsolicited fax advertisement, pursuant to Section 227(b)(3)(B), United States Code, Title 47.

28. Defendant is also subject to liability for an injunction to be granted to prohibit and prevent future violations.

SECOND CLAIM

29. Plaintiffs re-allege paragraphs One (1) through Twenty-Eight (28) of this Complaint, as if fully re-written herein.

30. In Ohio, the definition of a "consumer transaction" includes any "solicitation to supply" consumer goods or services. See, Ohio R.C. § 1345.01(A) of the Ohio Consumer Sales Practices Act.

31. Defendant's fax advertisements were a "solicitation to supply" consumer goods or services.

32. These aforesaid fax advertisements were transmitted, by or on behalf of the Defendant, to Plaintiffs **Phillip Dubsky, Charles Harper, Norberto Juan, Jang Kongthong, Dan Rose, David Rose, Marvin Speer, and Sonia Tanio**, without their "prior express invitation or permission", in violation of the federal Telephone Consumer Protection Act (TCPA), 47 U.S.C. § 227(a)(4) and 227(b)(1)(C).

33. Ohio courts have declared that a violation of the federal TCPA, Section 227, United States Code, Title 47, constitutes a breach of the Ohio Consumer Sales Practices Act, Section 1345.02(A) of the Ohio Revised Code.

34. It is a violation of the federal Telephone Consumer Protection Act, 47 U.S.C. § 227 (a)(4), to transmit faxes advertising the availability or quality of goods or services, without obtaining the "prior express invitation or permission" of the recipient.

35. Ohio court decisions have declared that any violation of the Telephone Consumer Protection Act (TCPA), 47 U.S.C. 227(a)(4), is a breach of Section 1345.02(A) of the Ohio Consumer Sales Practices Act, (CSPA).

36. Ohio court decisions have declared that the sending of any unsolicited fax advertisement is an unfair or deceptive act or practice, in violation of Section 1345.02(A) of the Ohio Consumer Sales Practices Act (CSPA), and that each unsolicited fax advertisement is a separate violation.

37. Defendant has thereby engaged in acts or practices, as described in this Complaint, which have been declared by Ohio courts to violate the Ohio Consumer Sales Practices Act (CSPA), Section 1345.02(A) of the Ohio Revised Code, and these court decisions are on file in the Public Inspection File (PIF) of the Attorney General of the State of Ohio, pursuant to R.C. § 1345.05 and 1345.09(B) of the Ohio Revised Code.

38. Defendant's acts or practices of sending uninvited and unrequested commercial fax advertisements is an *inherently unfair and deceptive* solicitation, within the meaning of R.C. §§ 1345.01(A) and 1345.02(A), since the solicitation is made through the *unlawful taking* of Plaintiffs' fax paper, toner ink and electricity, as well as an *unauthorized use* of Plaintiffs' fax machines. These are implicit acts of conversion, property damages and violation of the privacy rights of the Plaintiffs, for

which the CSPA provides a statutory remedy. See, RC 1345.02(A) and 1345.09.

39. Defendant is liable, under Section 1345.09(B) of the Ohio Revised Code, for engaging in unfair or deceptive acts or practices, including acts or practices which have previously been declared, by Ohio court decisions, to be a violation of Section 1345.02(A) of the Ohio Revised Code, and filed in the Public Inspection File of the Ohio Attorney General.

40. Defendant *knew* it was sending unsolicited fax advertisements, and thus the Defendant *knowingly* committed an act or practice that violated Section 1345.02(A) of the Ohio Revised Code, and therefore the Defendant is liable for Plaintiffs' attorneys fees, pursuant to Section 1345.09(F) of the Ohio Revised Code, for all time expended in connection with this matter.

41. Plaintiffs are entitled, under Section 1345.09(B) of the Ohio Revised Code, to bring an action in this court to enjoin further violations, and to receive **Two Hundred Dollars (\$200)** damages for Defendant's above-described violation, as well as attorneys fees.

THIRD CLAIM

42. Plaintiffs hereby re-allege Paragraphs One (1) through Forty-One (41) of this Complaint, as if fully re-written herein.

43. It is mandatory, under 47 U.S.C. § 227(d) and 47 C.F.R. § 68.318(d) that all fax advertisements include the date and time of transmittal.

44. Defendant's unsolicited fax advertisements *did not* include the date and time that the faxes were sent.

45. Defendant *knew* that its fax advertisements failed to include the date and time

in which the faxes were sent.

46. Defendant *willfully* failed to include the date and time in which the faxes were sent.

47. Plaintiffs are entitled to damages in the sum of **One Thousand Fifteen Hundred Dollars (\$1,500)** pursuant to 47 C.F.R. § 68.318 (d) and 47 U.S.C. § 227(b)(3), for each fax on which Defendant failed to include the date and time that the fax was sent.

FOURTH CLAIM

48. Plaintiffs re-allege Paragraphs One (1) through Forty-Seven (47) of this Complaint, as if fully re-written herein.

49. Ohio court decisions have declared that any violation of the Telephone Consumer Protection Act (TCPA), 47 U.S.C. 227(a)(4), is a breach of Section 1345.02(A) of the Ohio Consumer Sales Practices Act, (CSPA).

50. It is a violation of the federal Telephone Consumer Protection Act, 47 U.S.C. § 227(d)(1)(B), for any person within the United States to use a computer or other electronic device to send any message via a telephone facsimile machine unless such person clearly marks, in a margin at the top or bottom of each transmitted page of the message or on the first page of the transmission, the date and time it is sent and an identification of the business, other entity, or individual sending the message.

51. It is an inherently unfair or deceptive practice, in violation of R.C. § 1345.02(A) of the Ohio Consumer Sales Practices Act, for an unsolicited fax advertisement to be transmitted unless the sender clearly marks, in a margin at the top or bottom of each transmitted page of the message or on the first page of the

transmission, the date and time it is sent and an identification of the business, other entity, or individual sending the message.

52. Defendant's unsolicited fax advertisements *did not* comply with the legal obligations of the federal Telephone Consumer Protection Act, since the Defendant failed to include any identification of the business, other entity, or individual sending the message. See, 47 U.S.C. § 227(d)(1)(B).

53. Ohio court decisions have held that a failure to comply with the legal obligations of the Telephone Consumer Practices Act is a violation of Section 1345.02(A) of the Ohio Consumer Sales Practices Act (CSPA).

54. Defendant's failure to comply with the above described legal obligations of the federal Telephone Consumer Protection Act, 47 U.S.C. § 227(d)(1)(B), is a violation of Section 1345.02(A) of the Ohio Consumer Sales Practices Act (CSPA).

55. Defendant is liable, under Section 1345.09(B) of the Ohio Revised Code, for engaging in unfair or deceptive acts or practices, including acts or practices which have previously been declared, by Ohio court decisions, to be a violation of Section 1345.02(A) of the Ohio Revised Code, and filed in the Public Inspection File of the Ohio Attorney General.

56. Defendant *knew* it was sending unsolicited fax advertisements without including any identification of the of the business, other entity, or individual sending the message, and thus the Defendant *knowingly* committed an act or practice that violated Section 1345.02(A) of the Ohio Revised Code, and therefore the Defendant is liable for Plaintiffs' attorneys fees, pursuant to Section 1345.09(F) of the Ohio Revised Code, for all time expended in connection with this matter.

57. Plaintiffs is entitled, under Section 1345.09(B) of the Ohio Revised Code, to bring an action in this court to enjoin further violations, and to receive **Two Hundred Dollars (\$200)** damages for Defendant's above-described violation, as well as attorneys fees.

FOURTH CLAIM

58. Plaintiffs re-allege paragraphs One (1) through Fifty-Seven (57) of this Complaint, as if fully rewritten herein.

59. Plaintiffs herein sue individually, and also as a member and representative of a class, pursuant to Ohio Civil Rule 23.

60. The aforesaid class is hereby defined as:

All persons and entities, within the 216 and 440 telephone area codes, to whom Defendant transmitted one or more advertisements by fax, at any time during the years 2000 through 2004, without obtaining prior express permission or invitation to do so.

61. The aforesaid class includes at least forty one (41) or more persons and entities, to whom Defendant transmitted advertisements by fax, without obtaining the prior express invitation or permission of the recipient.

62. The class is so numerous that joinder of all members is impracticable.

63. Questions of law and fact are common to the class.

64. The claims of the representative Plaintiffs are typical of the claims of the class.

65. Plaintiffs will fairly and adequately protect the interests of the class.

66. This claim is filed, in this court, pursuant to Section 227(b)(3), United

States Code, Title 47, to enjoin violations of the federal Telephone Consumer Protection Act (Section 227, United States Code, Title 47), and also for the Plaintiffs to be awarded **Five Hundred Dollars (\$500)** for each separate violation, or **Triple Damages (\$1,500)** if the Defendant unsolicited fax advertisements were sent willfully.

67. Defendant **knew** that it was sending, or causing to be sent, unsolicited advertisements by fax.

68. The defendant, **Flagstaff Industries Corp.**, acted voluntarily, and under its own free will, and therefore **willfully** sent, or caused to be sent, unsolicited advertisements by fax.

69. Defendant is therefore liable for the sum of **\$1,700** in damages, for each separate unsolicited fax advertisement, pursuant to Section 227(b)(3)(B), United States Code, Title 47.

DEMAND FOR JUDGMENT

WHEREFORE, Plaintiffs pray for judgment of this Court against Defendant, for all damages allowed by law, for themselves, and for the Class Plaintiffs.

The Plaintiffs further pray for an award of reasonable Attorneys Fees, and costs of this action, along with an Order enjoining Defendant from transmitting any further unsolicited advertisements by fax to Plaintiffs or to anyone else, without obtaining prior express invitation or permission to do so, and keeping written records of such consent.

Respectfully submitted,

JOSEPH R. COMPOLI, JR.
(Reg. No. 0031193)
612 East 185th Street
Cleveland, Ohio 44119
Tel: (216) 481-6700
Fax: (216) 481-1047
Attorney for Plaintiffs

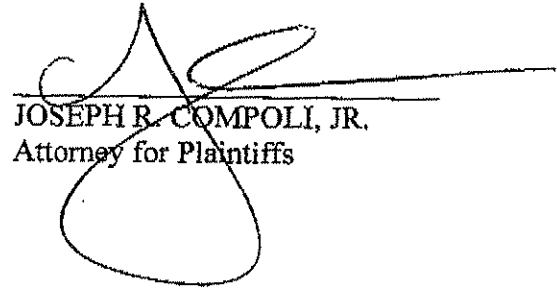
DEMAND FOR TRIAL BY JURY

Plaintiffs hereby demands trial by the maximum number of jurors allowed by law, on all issues raised by the Plaintiffs' pleadings, pursuant to Ohio Civil Rule 38.

JOSEPH R. COMPOLI, JR.
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

A copy of the foregoing Plaintiffs' First Amended Complaint, was sent to Flagstaff Industries Corp. at 560 State Road, P.O. Box 1330, Bensalem, PA 19020, by regular U.S. mail, first class, postage prepaid, on this 14 day of October, 2005. -



JOSEPH R. COMPOLI, JR.
Attorney for Plaintiffs

Aug. 20. 2009 10:56AM

No. 4541 P. 42

47 U.S.C. 227

Chapter 5

227. Restrictions on the use of telephone equipment

a) Definitions

As used in this section:-

(1) The term "automatic telephone dialing system" means equipment which has the capacity-

(A) to store or produce telephone numbers to be called, using a random or sequential number generator; and

(B) to dial such numbers.

(2) The term "telephone facsimile machine" means equipment which has the capacity (A) to transcribe text or images, or both, from paper into an electronic signal and to transmit that signal over a regular telephone line, or (B) to transcribe text or images (or both) from an electronic signal received over regular telephone line onto paper.

(3) The term "telephone solicitation" means the initiation of a telephone call or message of the purpose of encouraging the purchase or rental of, or investment in, property, goods, or services, which is transmitted to any person, but such term does not include a call or message (A) to any person with that person's prior express invitation or permission, (B) to any person with whom the caller has an established business relationship, or (C) by a tax exempt nonprofit organization.

(4) The term "unsolicited advertisement" means any material advertising the commercial availability or quality of any property, goods, or services which is transmitted to any person without that person's prior express invitation or permission.

(b) Restrictions on the use of automated telephone equipment

(1) Prohibitions

It shall be unlawful for any person within the United States--

(A) to make any call (other than a call made for emergency purposes or made with the prior express consent of the called party) using any automatic telephone dialing system or an artificial or prerecorded voice--

(B) to initiate any telephone call to any residential telephone line using an artificial or prerecorded voice to deliver a message without the prior express consent of the called party, unless the call is initiated for emergency purposes or is exempted by rule or order by the Commission under paragraph (2)(B);

(C) to use any telephone facsimile machine, computer, or other device to send an unsolicited advertisement to a telephone facsimile machine; or

(D) to use an automatic telephone dialing system in such a way that two or more telephone lines of a multi-line business are engaged simultaneously.

(2) Regulations: exemptions and other provisions

The Commission shall prescribe regulations to implement the requirements of this subsection. In implementing the requirements of this subsection, the Commission--

(A) shall consider prescribing regulations to allow businesses to avoid receiving calls made using an artificial or prerecorded voice to which they have not given their prior express consent;

(B) may, by rule or order, exempt from the requirements of paragraph (1)(B) of this subsection, subsection, subject to such conditions as the Commission may prescribe--

(i) calls that are not made for a commercial purpose; and

(ii) such classes or categories of calls made for commercial purposes as the Commission determines--

(I) will not adversely affect the privacy rights that this section is intended to protect; and

(II) do not include the transmission of any unsolicited advertisement;

and

(C) may, by rule or order, exempt from the requirements of paragraph (1)(A)(iii) of this subsection calls to a telephone number assigned to a cellular telephone service that are not charged to the called party, subject to such conditions as the Commission may prescribe as necessary in the interest of the privacy rights this section is intended to protect.

(3) Private right of action

A person or entity may, if otherwise permitted by the laws or rules of court of a State, bring in an appropriate court of that State--

(A) an action based on a violation of this subsection or the regulations prescribed under this subsection to enjoin such violation.

(B) an action to recover for actual monetary loss from such a violation, or to receive \$500 in damages for each such violation, whichever is greater, or

(C) both such actions.

If the court finds that the defendant willfully or knowingly violated this subsection or the regulations prescribed under this subsection, the court may, in its discretion, increase the amount of the award to an amount equal to not more than 3 times the amount under subparagraph (B) of this paragraph.

OHIO REVISED CODE

SECTION 1345.01 Definitions

As used in sections 1345.01 to 1345.13 of the Revised Code:

(A) "Consumer transaction" means a sale, lease, assignment, award by chance, or other transfer of an item of goods, a service, a franchise, or an intangible, to an individual for purposes that are primarily personal, family, or household, or solicitation to supply any of these things.

SECTION 1345.02 (A) Unfair or deceptive consumer sales practices prohibited

(A) No supplier shall commit an unfair or deceptive act or practice in connection with a consumer transaction. Such an unfair or deceptive act or practice by a supplier violates this section whether it occurs before, during, or after the transaction.

SECTION 1345.09 Private remedies

For a violation of Chapter 1345. Of the Revised Code, a consumer has a cause of action and is entitled to relief as follows:

(A) Where the violation was an act prohibited by section 1345.02 or 1345.03 of the Revised Code, the consumer may, in an individual action, rescind the transaction or recover his damages.

(B) Where the violation was an act or practice declared to be deceptive or unconscionable by rule adopted under division (B)(2) of section 1345.05 of the Revised Code before the consumer transaction on which the action is based, or an act or practice determined by a court of this state to violate section 1345.02 or 1345.03 of the Revised Code and committed after the decision containing the determination has been made available for public inspection under division (A)(3) of section 1345.05 of the Revised Code, the

consumer may rescind the transaction or recover, but not in a class action, three times the amount of this actual damages or two hundred dollars, whichever is greater, or recover damages or other appropriate relief in a class action under Civil Rule 23, as amended.

(C) In any action for rescission, revocation of the consumer transaction must occur within a reasonable time after the consumer discovers or should have discovered the ground for it and before any substantial change in condition of the subject of the consumer transaction.

(D) Any consumer may seek a declaratory judgment, an injunction, or other appropriate relief against an act or practice that violates this chapter.

(E) When a consumer commences an individual action for a declaratory judgment or an injunction or a class action under this section, the clerk or court shall immediately mail a copy of the complaint to the attorney general. Upon timely application, the attorney general may be permitted to intervene in a private action or appeal pending under this section. When a judgment under this section becomes final, the clerk of court shall mail a copy of attorney general for inclusion in the public file maintained under division (A)(3) of section 1345.05 of the Revised Code.

(F) The court may award to the prevailing party a reasonable attorney's fee limited to the work reasonably performed, if either of the following apply:

(1) The consumer complaining of the act or practice that violated this chapter has brought or maintained an action that is groundless, and the consumer filed or maintained the action in bad faith;

(2) The supplier has knowingly committed an act or practice that violates this chapter.

HISTORY: 134 v H 103 (Eff 7-14-72); 137 v H 681. Eff 8-11-78.

FLAGSTAFF INDUSTRIES CORPORATION

a Manufacturer of Healthcare Uniforms

\$16.00 Size Matching Scrub Sets

Sizes XS thru XL, 2XL and up slightly higher.

5 Beautiful Colors: Caribbean Teal, China Blue,

Robin's Egg Blue, Magenta & Pastel Pink!

See them online!

ORDER NOW:

1-800-426-4607

Ask for a FREE catalog

OR ORDER ONLINE!

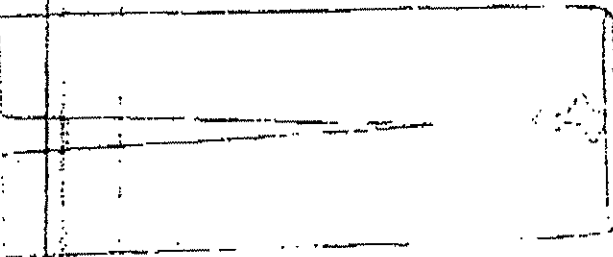
<https://www.flagstaffuniforms.com>

Ref. code# FM026A

Register to win a **FREE** Size Matching Scrub Set

at www.flagstaffuniforms.com

Offer expires July 4th, 2003



If you no longer wish to receive offers from our company, please contact us at 1-800-426-4607 and we will have the removal from our mailing list.

Aug. 20, 2009 10:57AM

No. 4541 P. 46

FLAGSTAFF INDUSTRIES

C O R P O R A T I O N

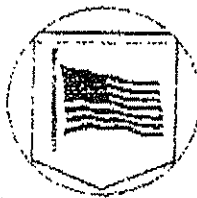
a manufacturer of Healthcare uniforms

presents a

SCRUB SET SUPER SALE

option 1

White Scrub Top
(Style# SS20)
w/ American Flag
Silkscreen
(As Shown)
XS - XL



Only

\$9.50

2XL & 3XL Slightly Higher
NOT available in any other color!

Add a pair of
Drawstring Pants
(Style# PS10)
in Navy or
Royal Blue
XS - XL

For Only

\$8.90

2XL & 3XL Slightly Higher

option 2

Scrub Top
(Style# SS20)
&
Scrub Pant
(Style# PS10)
Size Matching Set
XS - XL

Only

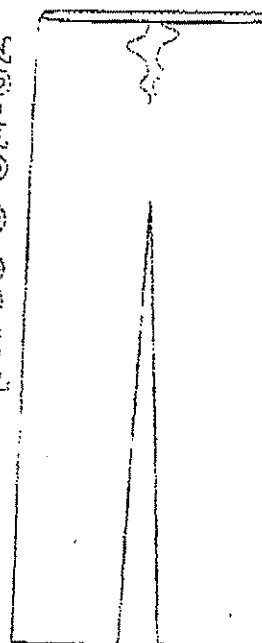
\$16.00

2XL & 3XL Slightly Higher

Available Colors

Emerald (S-3XL)
Light Blue (XS-3XL)
Periwinkle (XS-2XL)

Offer Expires 8-02-02



See the colors at our website:
www.flagstaffuniforms.com

Reference Code: FM012
Ask for a **FREE** catalog!

Order Now!

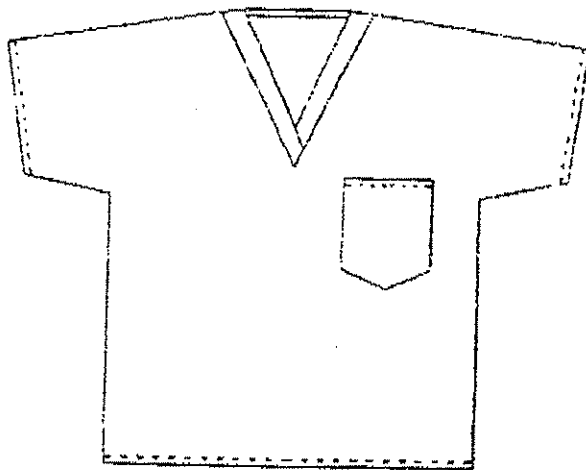
1-800-426-4607

If you have received this fax in error or wish to have your fax# removed from our list please call 1-800-426-4607. Thank you.

—Harper

FLAGSTAFF INDUSTRIES CORPORATION

WEEKEND



WINTER WEIGHT Twill SCRUB SET

SS20 ~ Classic scrub top, one pocket. Liberal fit.

&

PS10 ~ Basic unisex drawstring pant, one rear pocket, 32" finished inseam.

Sold as a size matching set **ONLY!** For example:
Shirt=Medium/Pant=Medium
65% Polyester/ 35% Cotton
Available in **Burgundy, Gold, Khaki, Royal Blue & Navy** for only

\$16.50!

in Sizes **XS - 2XL**.

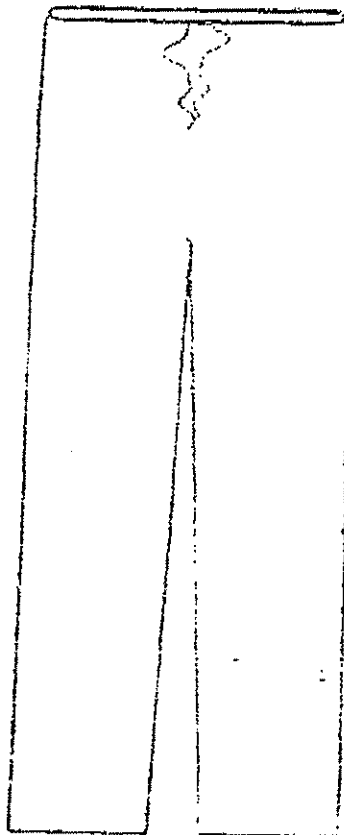
(2XL slightly higher)

Limited quantity's so

CALL NOW!

1-800-426-4607

ORDER 12-31-00



When ordering refer to code:

FM004

Free catalogs are available!

Flagstaff Industries Corp. 565 State Road S. Box 200 P.O. Box 200, 17100 PA 17100
Phone 2 426-4607 Fax 2 426-4607

— Harter

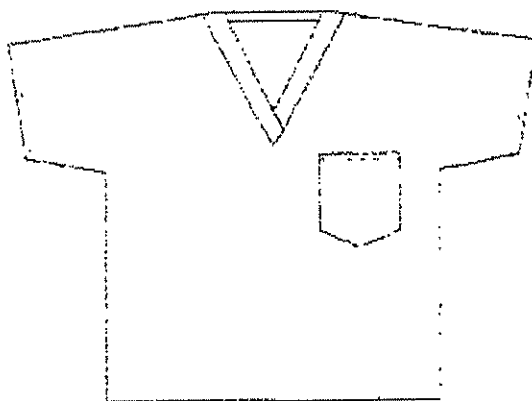
Flagstaff Industries Corp (09/09/02/07:48AM)

FLAGSTAFF INDUSTRIES C O R P O R A T I O N

a manufacturer of Healthcare uniforms

presents a

SEPTEMBER SCRUB SET SUPER SALE



Scrub Top & Scrub Pant
(Style# SS20) (Style# PS10)

Size Matching Set
XS - XL Only

\$16.00

2XL Available at ~~\$17.00~~

Available Colors

Charcoal Fuchsia

Royal Blue Navy Violet*

*Violet is NOT available in X-Small

See the colors at our website:
www.flagstaffuniforms.com

Order Now!

1-800-426-4607

Reference Code: FM015
Ask for a **FREE** catalog!

If you have received this fax in error or wish to have your fax# removed from our list please call 1-800-426-4607. Thank you.

Order Expires 9-20-09

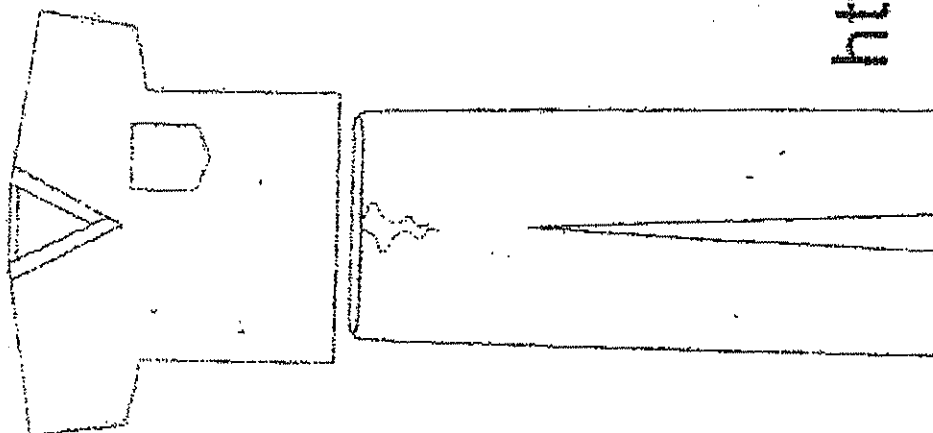
Aug. 20. 2009 10:58AM

No. 4541 P. 49

FLAGSTAFF INDUSTRIES CORPORATION
a Manufacturer of Healthcare Uniforms

\$16.00 Size Matching Scrub Sets

Sizes XS thru XL, 2XL and up slightly higher.



Colors: Light Navy, Light Olive & Oyster.

Wildflower Print Is Now Available!

Ask about additional scrub set options
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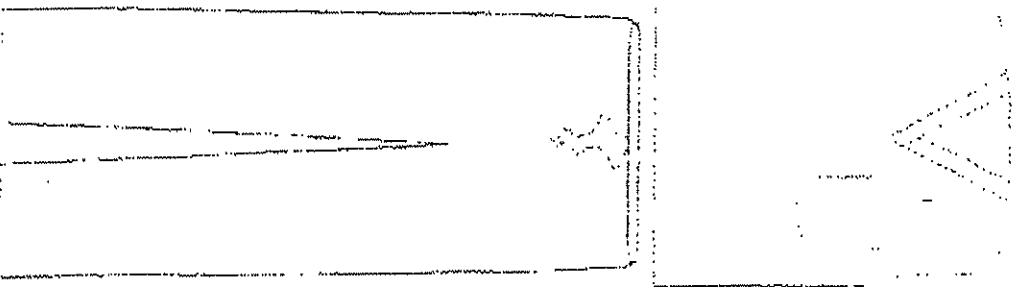
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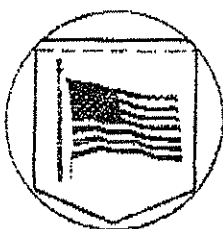
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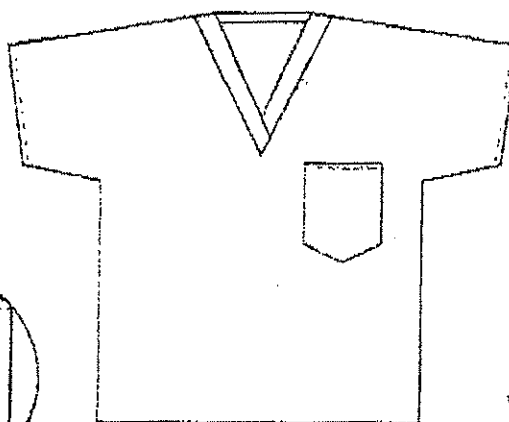
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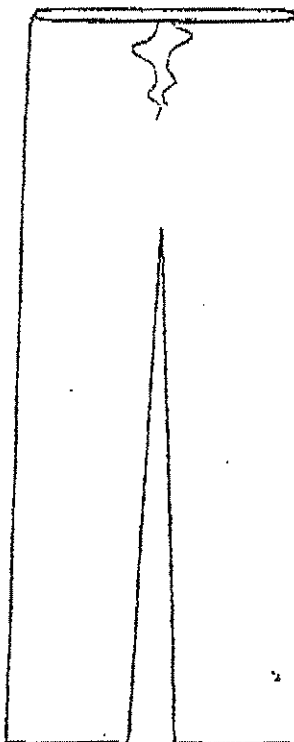
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\$16.00

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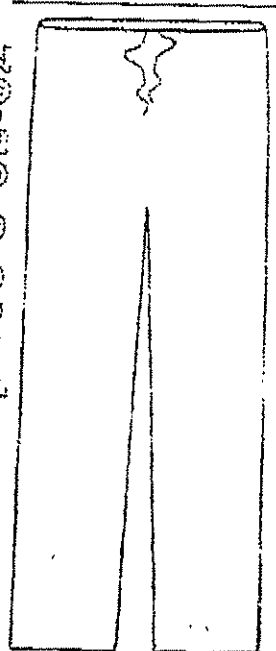
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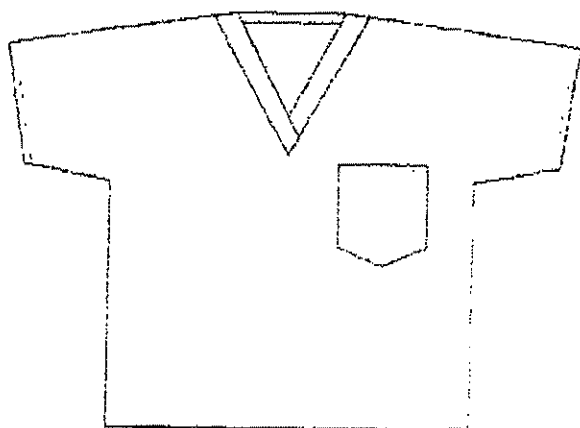
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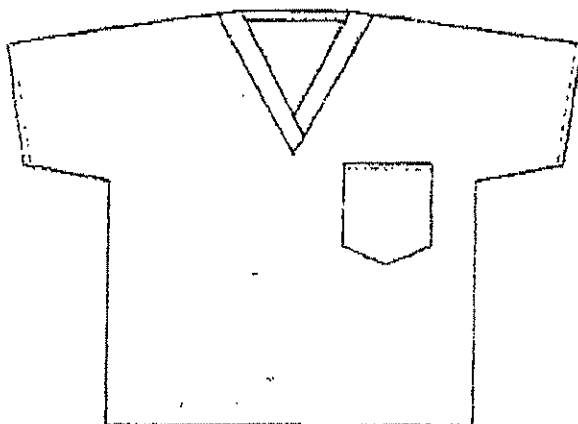
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Available Colors

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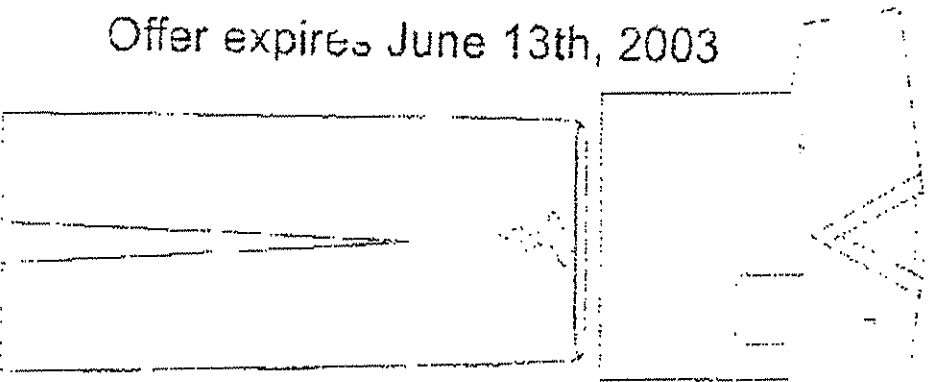
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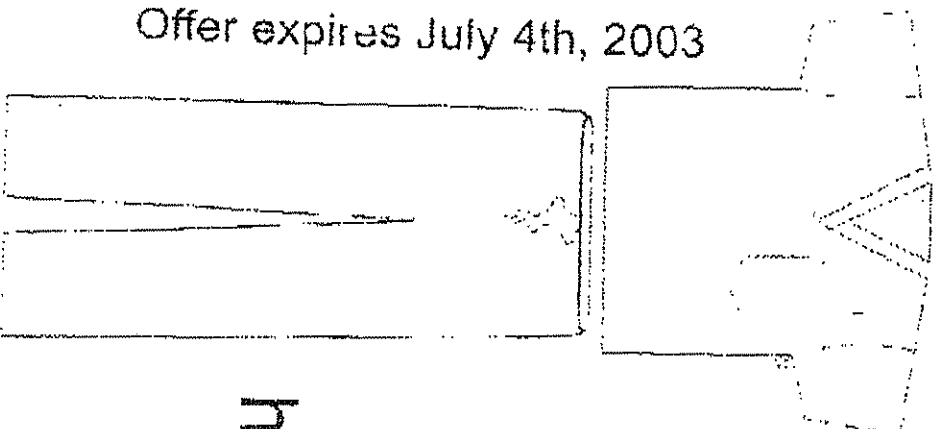
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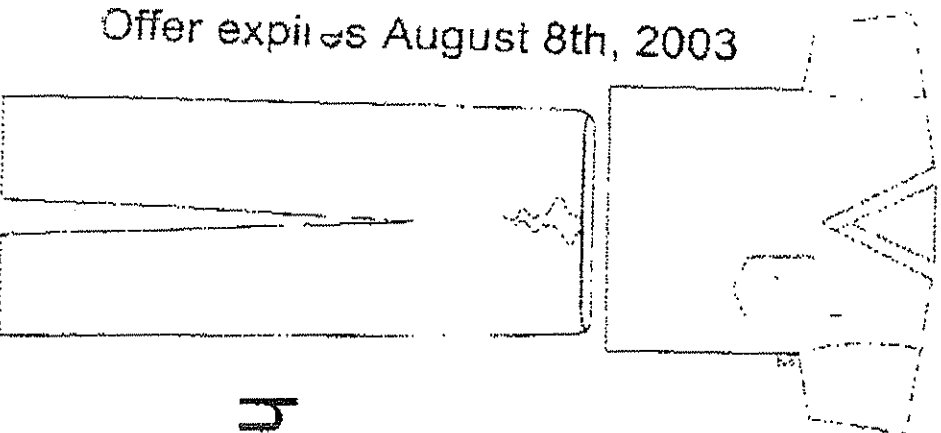
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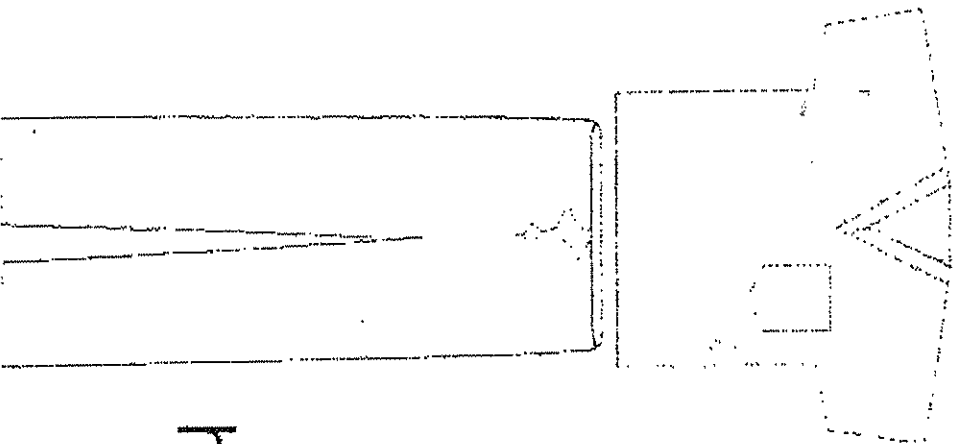
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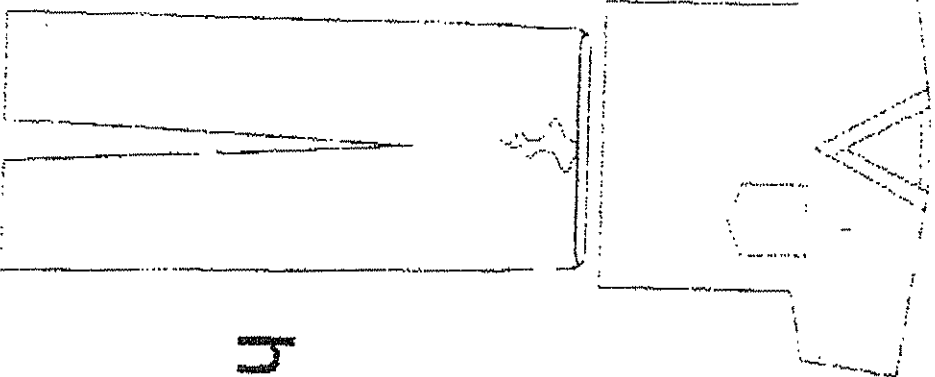
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100% Cotton Colors: Burgundy & Purple
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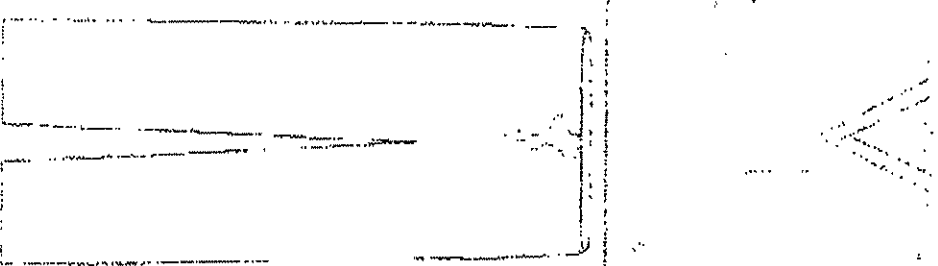
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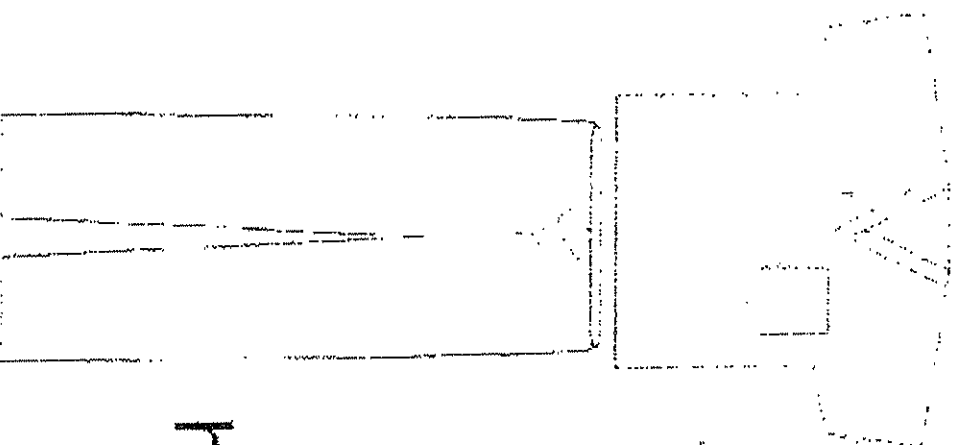
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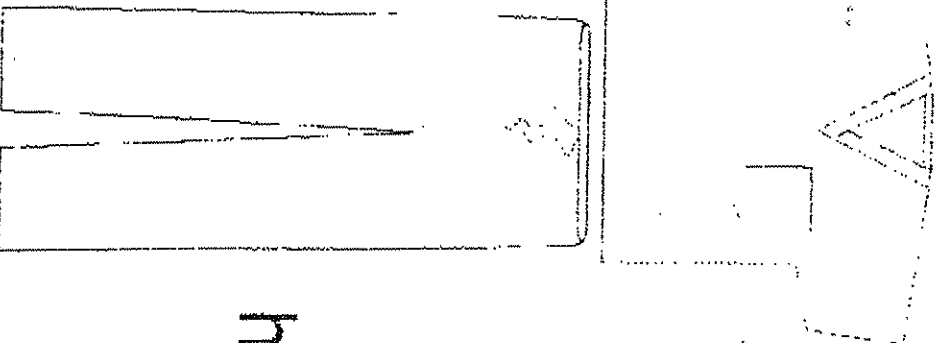
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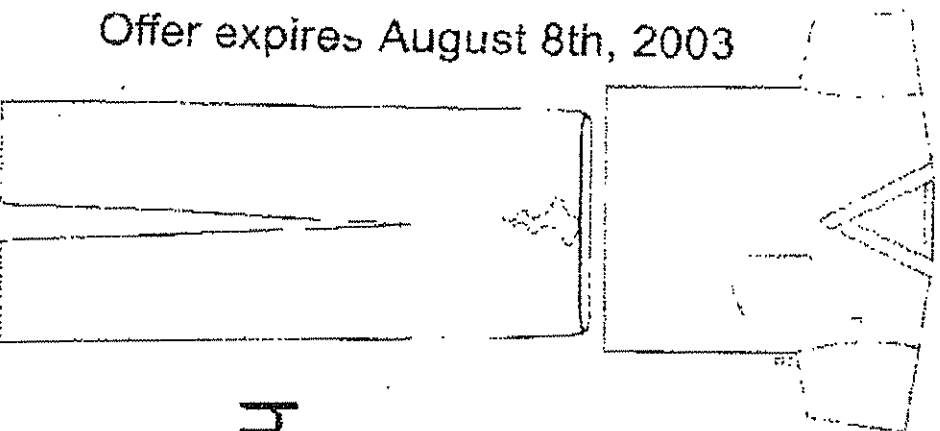
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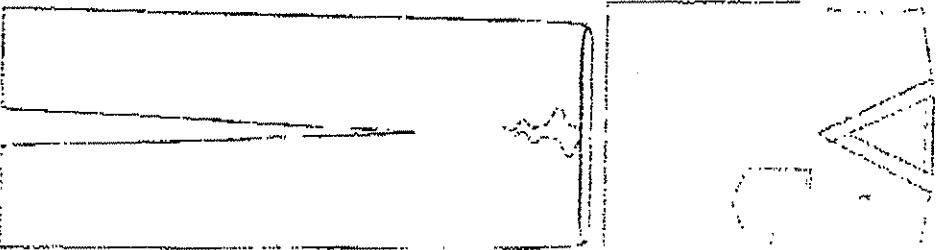
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